

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ARMANDO SERRANO,

Plaintiff,

v.

REYNALDO GUEVARA, et al.,

Defendants.

Case No. 1:17-cv-02869

Hon. Manish S. Shah

Magistrate Judge Jeffrey Cole

JOSE MONTANEZ,

Plaintiff,

v.

REYNALDO GUEVARA, et al.,

Defendants.

Case No. 1:17-cv-04560

Hon. Manish S. Shah

Magistrate Judge Jeffrey Cole

**DEFENDANT MATTHEW COGHLAN'S
UNOPPOSED MOTION FOR ENTRY OF FERPA ORDER**

Defendant Matthew Coghlan, by and through his attorneys, moves this Honorable Court, pursuant to Rule 26(c), to enter the submitted unopposed FERPA Order. In support thereof, Mr. Coghlan states as follows:

1. On September 17, 2018, Mr. Coghlan issued subpoenas to the Northwestern University Archives and the Medill School of Journalism, seeking documents pertaining to these lawsuits. Since that time, counsel for Northwestern and Mr. Coghlan have engaged in discussions regarding the appropriate scope of Northwestern's response to those subpoenas, and regarding the confidentiality of certain records that Northwestern has agreed to produce.

2. Some of the documents which are responsive to the subpoenas contain personal identifying information of former students associated with Northwestern. This information is protected by the Family Educational Rights and Privacy Act (“FERPA”), 20 U.S.C. § 1232g.

3. The proposed, unopposed FERPA Order would prohibit the use of the information protected by FERPA for any purpose other than litigation of this case. The Order would further prohibit the dissemination of that information to parties outside this litigation. Such an order would ensure the protection of such information, consistent with the principles of federal and Illinois law and protect against unfairness in the trial process. For these reasons, there is good cause for entry of the Order.

4. Counsel for the Defendants and Plaintiffs have advised they have no objection to the entry of the proposed FERPA Order.

5. Mr. Coghlan submits the proposed Order as Exhibit A. A copy of the Order is also being sent to Judge Cole’s proposed order email box.

WHEREFORE, Mr. Coghlan respectfully requests that this Court enter the submitted proposed FERPA Order.

Dated: November 20, 2018

Respectfully submitted,

/s/ Paula S. Quist

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*Counsel for Defendant Matthew
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CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of November, 2018, I filed the foregoing with the Clerk of the United States District Court using the CM/ECF system, which will send notification electronically to all counsel of record.

/s/ Paula S. Quist

Paula S. Quist

Counsel for Matthew Coghlan